

ORIGINAL

Hopping Green & Sams

Attorneys and Counselors

Writer's Direct Dial No.
(850) 425-2359

September 21, 2004

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16 SEP 22 AM 7:45

BY HAND DELIVERY

Blanca Bayó
Director Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399

Re: Docket No. 040003-GU
CONFIDENTIAL DOCUMENTS ENCLOSED

Dear Ms. Bayó:

Enclosed for filing on behalf of City Gas Company of Florida are the following:

- (1) The original and seven copies of its Request for Confidential Classification, including descriptions of the confidential information and justifications for the claim of confidentiality (Exhibit A);
- (2) Seven copies of redacted versions of the confidential documents (Exhibit B); and
- (2) A confidential envelope containing one copy of the documents on which the confidential material has been highlighted.

CMP _____
COM _____ By copy of this letter, copies of item (1) been furnished to the parties on the attached
CTR _____ certificate of service. Please stamp and return the enclosed extra copy of this filing.
ECR _____

GCL 1 _____ If you have any question regarding this filing, please contact the undersigned.
OPC _____

MMS _____
RCA 1 _____

SCR _____
SEC 1 _____

OTH 1 _____
cc: Ms. Gloria L. Lopez
Certificate of Service (without Exhibit B)

Very truly yours,

Gary V. Perko

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14
FPSC-BUREAU OF RECORDS

Enclosures

DOCUMENT NUMBER-DATE

10224 SEP 22 8

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the City Gas Company of Florida's Request for Confidential Classification of Staff's Audit Workpapers in Docket No. 040003GU (without Exhibit B) has been furnished by U.S. mail to the following this 21st day of September, 2004.

Katherine E. Fleming (*)
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Florida Public Service Commission
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Tallahassee, FL 32399

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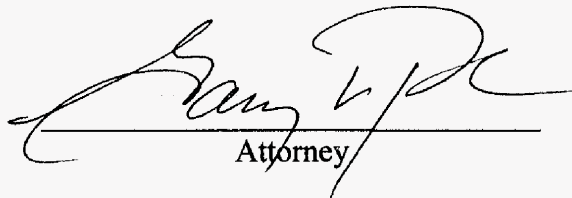
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Attorney

*also by hand-delivery, with Exhibit B

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Purchased Gas Adjustment)
(PGA) True-Up)
_____)

Docket No. 040003-GU

Filed: September 21, 2003

**CITY GAS COMPANY OF FLORIDA'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION
OF STAFF'S AUDIT WORKPAPERS**

City Gas Company of Florida, a division of NUI Corporation ("NUI/City Gas") pursuant to Section 366.093, Florida Statutes and Rule 25-22.006(3)(a)2 and (4), Florida Administrative Code, submits this Request for Confidential Classification of the documents described below which were provided to Commission auditors as workpapers during NUI/City Gas' Purchased Gas Adjustment audit for the year ended December 31, 2003 (Audit Control #04-043-4-3). In support of this request for Confidential Classification, NUI/City Gas states as follows:

1. In connection with Staff's audit in this docket, NUI/City Gas provided documents to the Staff containing information that is "proprietary business information" under Section 366.093(3), Florida Statutes. All items for which the company is requesting confidentiality were included with the audit workpapers filed with the Commission, have been held temporarily confidential, and should not be released to the public.

2. A list of the audit workpapers containing confidential information for which NUI/City Gas requests confidential treatment is attached hereto as Exhibit A.

3. NUI/City Gas requests that the information described in Exhibit A be classified as "proprietary business information" within the meaning of Section 366.093(3), Florida Statutes. The information and documents at issue are intended to be, and are, treated by NUI/City Gas as

DOCUMENT NUMBER-DATE

10224 SEP 22 8

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proprietary and confidential. Exhibit A contains detailed justifications for the requested confidential treatment of the highlighted portions of the documents at issue.

4. Contemporaneously with this Request, City Gas is filing seven copies of Composite Exhibit "B" which includes redacted versions of documents described in Exhibit A. Where only a portion of the document is confidential, the specific information for which confidential treatment is requested has been blocked out by opaque marker. Since the company is requesting confidential treatment of certain documents in their entirety, separate blocked-out versions of the entire documents have not been submitted. Rather, for such documents, Exhibit "B" includes a single page indicating that the entire document has been redacted.

5. Unedited versions of the documents described in Exhibit A are being submitted to the Division of Records and Reporting in a separate envelope labeled "CONFIDENTIAL." In the unedited versions, the information asserted to be confidential is highlighted either by yellow marker or, in the case of documents which are confidential in their entirety, by copying on yellow paper.

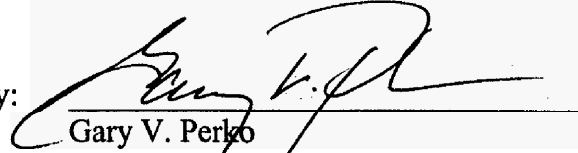
6. NUI/City Gas requests that the information for which it seeks confidential classification remain confidential for a period of at least 18 months as provided in Section 366.093 (4), Florida Statutes.

WHEREFORE, for the foregoing reasons, NUI/City Gas respectfully requests that its Request for Confidential Classification be granted.

RESPECTFULLY SUBMITTED this 21st day of September, 2004.

HOPPING GREEN & SAMS

By:

A handwritten signature in black ink, appearing to read "Gary V. Perko", is written over a horizontal line. The signature is fluid and cursive.

Gary V. Perko
P.O. Box 6526
Tallahassee, FL 32314
(850) 222-7500

Attorneys for NUI/City Gas

EXHIBIT A

CUSTOMER BILLING INFORMATION				
Workpaper No.	Description	Page No(s).	Line No(s).	Justification
41-4/1	Billing Register	1	1-12	A
41-4/1-1	Customer Bills	1-13	1-3	A
41-4/2	Billing Register	1	1-12	A
41-4/2-1	Customer Bills	1-12	1-3	A
41-4/3	Billing Register	1	1-12	A
41-4/3-1	Customer Bills	1-12	1-3	A
41-4/4	Billing Register	1	1-11	A
41-4/4-1	Customer Bills	1-12	1-3	A
41-4/5	Billing Register	1	1-8	A
41-4/5-1	Customer Bills	1-12	1-3	A
41-4/5-2	Customer Bill	1	1-3	A
41-4/6	Billing Register	1	1-10	A
41-4/6-1	Customer Bill	1-12	1-3	A
41-4/7	Billing Register	1	1-12	A
41-4/7-1	Customer Bills	1-12	1-3	A
41-4/7-2	Customer Bill	1	1-3	A
41-4/8	Billing Register	1	1-9	A
41-4/8-1	Customer Bills	1-16	1-3	A

Document No.	Description	Page No(s).	Line No(s).	Justification
43-2/1	FGT Invoices	1-6	1-4	B
43-2/2	FGT Invoices	1-3	1-4	B
43-2/6	FGT Invoice	1	1-4	B
43-4/21-1	NUI Check	1	1	B
	FGT Check	6	1	B
43-4/21	FGT Check	5	1	B

Document No.	Description	Page No(s).	Line No(s).	Justification
43-2/5-1	Staff Notes on Gas Contracts	1	1-17	C
43-2/5-1/1	Staff Record Request	1	1-4	C
43-2/4	Gas Supplier Invoice	ALL	ALL	C, B
43-2/5	Gas Supplier Invoice	ALL	ALL	C, B
43-2/5-1/2	Answer to Staff Record Request	1	1-11	C
		2	1-10	C
43-2/8	Gas Supplier Invoice	ALL	ALL	C, B
43-2/9	Gas Supplier Invoice	ALL	ALL	C, B
43-2/10	Gas Supplier Invoice	ALL	ALL	C, B
43-2/11	Gas Supplier Invoice	ALL	ALL	C, B
43-2/12	Gas Supplier Invoice	ALL	ALL	C, B
43-2/13	Gas Supplier Invoice	ALL	ALL	C, B
43-2/14	Gas Supplier Invoice	ALL	ALL	C, B
43-2/15	Gas Supplier Invoice	ALL	ALL	C, B
43-2/16	Gas Supplier Invoice	ALL	ALL	C, B
43-2/17	Gas Supplier Invoice	ALL	ALL	C, B
43-2/18	Gas Supplier Invoice	ALL	ALL	C, B
43-2/19	Gas Supplier Invoice	ALL	ALL	C
43-2/20	Gas Supplier Invoice	ALL	ALL	C
43-2/24	Gas Supplier Invoice	ALL	ALL	C
43-2/29	Gas Supplier Invoice	ALL	ALL	C
43-2/30	Gas Supplier Invoice	ALL	ALL	C, B
43-2/31	Gas Supplier Invoice	ALL	ALL	C
43-2/32	Gas Supplier Invoice	ALL	ALL	C, B
43-2/33	Gas Supplier Invoice	ALL	ALL	C
43-3/5	Gas Supplier Invoice	ALL	ALL	C, B
43-4/20	Gas Supplier Invoice	ALL	ALL	C, B
43-5/1-1	Gas Supplier Invoice	ALL	ALL	C, B
43-5/1-1/1	Trading Deal Sheet	1	1-3	C
43-5/1-1/2	Trading Deal Change Sheet	1	1-5	C
43-5/1-2	Gas Supplier Invoice	ALL	ALL	C, B

NATURAL GAS SUPPLIER/CUSTOMER INFORMATION				
Document No.	Description	Page No(s).	Line No(s).	Justification
43-5/1-3	Gas Supplier Invoice	ALL	ALL	C, B
43-5/1-4	Gas Supplier Invoice	ALL	ALL	C, B
43-5/1-4/1	Deal Change Sheet	1	1-2	C
43-5/1-4/2	Deal Sheet	1	1-5	C
43-5/1-4/3	Deal Change Sheet	1	1-3	C
43-5/1-5	Gas Supplier Invoice	ALL	ALL	C, B
43-5/1-6	Gas Supplier Invoice	ALL	ALL	C, B
43-5/1-7	Gas Supplier Invoice	ALL	ALL	C, B
43-5/1-8	Gas Supplier Invoice	ALL	ALL	C, B
43-5/1-9	Gas Supplier Invoice	ALL	ALL	C, B
43-5/1-9/1	Deal Change Sheet	1	1-4	C
43-5/1-9/2	Deal Change Sheet	1	1-2	C
43-5/1-11	Gas Supplier Invoice	ALL	ALL	C
43-5/1-14	Gas Supplier Invoice	1	ALL	C, B
43-5/1-15	Gas Supplier Invoice	ALL	ALL	C, B
43-5/1-16	Gas Supplier Invoice	ALL	ALL	C, B
43-5/1-17	Gas Supplier Invoice	ALL	ALL	C, B
43-5/1-18	Gas Supplier Invoice	ALL	ALL	C, B
43-5/1-19	Gas Supplier Invoice	ALL	ALL	C, B
43-5/1-20	Gas Supplier Invoice	ALL	ALL	C, B
44-1/1-1	Gas Supplier Invoice	ALL	ALL	A, B, C
44-1/1-2	Deal Sheet	1	1-5	A, C
44-1/1-3	Gas Supplier Invoice	ALL	ALL	A, B, C
44-1/1-4	Deal Sheet	1	1-8	A, C
	Deal Change Sheet	2	1-4	C
44-1/1-5	Deal Sheet	1	1-8	A, C
	Deal Change Sheet	2	1-3	A, C
44-1/2-1	Gas Supplier Invoice	ALL	ALL	C, B
44-1/2-2	Gas Supplier Invoice	ALL	ALL	C, B
43-1/2-2/1	Deal Sheet	1	1-4	A, C
44-1/2-2/2	Deal Sheet	1	1-5	A, C

NATURAL GAS SUPPLIER/CUSTOMER INFORMATION				
Document No.	Description	Page No(s).	Line No(s).	Justification
	Deal Sheet	2	1-4	A, C
44-1/2-3	Gas Supplier Invoice	ALL	ALL	A, C
44-1/2-3/1	Deal Sheet	1	1-4	A, C
45-1/1	Gas Supplier Invoice	1	ALL	C
45-1/2	Gas Supplier Invoice	ALL	ALL	C
45-1/3	Gas Supplier Invoice	1	ALL	C
45-1/4	Gas Supplier Invoice	ALL	ALL	C
45-1/5	Gas Supplier Invoice	1	ALL	C
45-1/6	Gas Supplier Invoice	ALL	ALL	C
45-1/7	Gas Supplier Invoice	1	ALL	C
45-1/8	Gas Supplier Invoice	ALL	ALL	C
45-1/9	Gas Supplier Invoice	1	ALL	C
45-1/10	Gas Supplier Invoice	ALL	ALL	C
45-1/11	Deal Sheet	1	1-6	C
		2	1-3	C
		3	1-3	C
		4	1-3	C
		5	1-3	C
		6	1-3	C
61-2/2	Staff workpaper - includes gas supplier identity and rate and total cost information	1	1-14	C
63	Audit Disclosure 5 - includes gas supplier identity	1	1-9	C
63-1	Staff workpaper - includes gas supplier identity	1	1-5	C
63-2	Schedule of Negotiated Amounts	1	1-8	C

CONTRACTUAL DATA				
Document No.	Description	Page No(s).	Line No(s).	Justification
43-2/5-1/5	Transaction Confirmation	1	1	D
		2	1	
		3	1-18	
		4	1-13	
		5	1-22	
43-2/5-1/6	Transaction Confirmation/ Contract	1	1	D (all lines indicated) B (p.15, lines 19-23)
		2	1-5	
		3	1-2	
		4	1-14	
		5	1-23	
		6	1-12	
		7	1-6	
		8	1-3	
		9 -10	1	
		11	1-6	
		12-14	1	
		15	1-32	
		16	1-5	
60-8	Gas Supply Contract - includes confidentiality agreement prohibiting disclosure in whole or part	ALL	ALL	D
60-8/1	Gas Supply Contract - includes confidentiality agreement includes confidentiality agreement prohibiting disclosure in whole or part	2- 33	ALL	D
61-5	Gas Supply Contracts - includes confidentiality agreement includes confidentiality agreement prohibiting disclosure in whole or part	2-21	ALL	D

STAFF WORKPAPERS RE: STIER ANDERSON AND LIBERTY AUDITS				
Document No.	Description	Page No(s).	Line No(s).	Justification
57	Summary of Findings	ALL	ALL	E,G
57-1	Summary of Staff Meetings with Stier Anderson	ALL	ALL	E
57-2	Summary of Staff Meetings with Liberty Consulting	ALL	ALL	G
57-3	Summary of Staff Interviews with Liberty and Stier Anderson		4-5, 12-13,	E
			8-14	
			7-21	
			1-31	
			5-11, 19-24	
			1-10	G
			1-3, 6-11, 14-21	
			1-7, 15-28	
			1-6,	
			1-31	
			1-4, 12-18	
			1-12	
57-4	Staff Memorandum regarding Liberty and Stier Anderson reports	1-3	ALL	E,G
		4	1-6	E,G
		4	7-23	G
		4	24-30	E
		5	ALL	G
		6	1-19	G
		6	20-30	E
		7	1-14	E
		7	15-29	E,G
		8	1-9	E,G
		8	10-24	G
		8	25-29	E
		9	1-5	E
		9	6-16	E,G

		9	7-30	G
		0	-6	E
		0	7-30	E, G
		1	ALL	E, G
57-5	Staff Memorandum regarding CGC PGA Audit - includes discussion of Liberty and Stier Anderson methodologies		1-12	E, G, C
		2	1-19	
		3	1-25	
		4	1-7	
57-6	Staff Questions for Liberty and Stier Anderson	3	1	E, G, C
		5	1-2	
57-7	Staff Notes from Liberty and Stier Anderson reports	ALL	ALL	E, G, C
60	Audit Disclosure 2 - OSS Sales and Purchases - includes discussion of Stier Anderson and Liberty methodologies	1	1-8	E, G
		1	9-13	G
		2	1-4	G
		2	5-13	E
		2	14-15	E, G
		5	1-2	E, G
60-1	Staff Summary of Interviews with Liberty and Stier Anderson	1	4-5, 12-13	E
		1	1-3, 6-13, 14-24	G
		2	5-11	E
		2	1-4, 12-31	G
		3	ALL	E
60-4	Staff Calculations based on Liberty Report	ALL	ALL	G
60-5	Staff Calculations based on Liberty Report	ALL	ALL	G
60-6	Staff Calculations based on Liberty Report	1	ALL	G
61	Audit Disclosure 3 - Description of Liberty and Stier Anderson methodologies	1	1-11	E, G
61-1	Staff Notes - description of Liberty and Stier Anderson methodologies	1	1-3	E, G
		2	1-24	E, G

62-2	Staff Audit Request - discusses Liberty Report	1	1-3	G
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STIER ANDERSON REPORT & WORKPAPERS

Document No.	Description	Page No(s).	Line No(s).	Justification
60-1/2	Stier Anderson workpaper	ALL	AL	E
60-2	Excerpt from Stier Anderson Report	ALL	ALL	E
60-2/1	Stier Anderson workpaper	ALL	ALL	E
60-2/2	Stier Anderson workpaper	ALL	ALL	E
60-2/3	Stier Anderson workpaper	ALL	ALL	E
60-3/1	Stier Anderson workpaper	ALL	ALL	E
60-4/1	Stier Anderson workpaper	ALL	ALL	E
60-4/2	Stier Anderson workpaper	ALL	ALL	E
60-4/3	Stier Anderson workpaper	ALL	ALL	E
60-5/1	Stier Anderson workpaper	ALL	ALL	E
60-5/2	Stier Anderson workpaper	ALL	ALL	E
60-5/3	Stier Anderson workpaper	ALL	ALL	E
60-6/1	Stier Anderson workpaper	ALL	ALL	E
60-6/2	Stier Anderson workpaper	ALL	ALL	E
60-6/3	Stier Anderson workpaper	ALL	ALL	E
61-2	Stier Anderson workpaper	2	ALL	E
61-2/3	Stier Anderson workpaper	ALL	ALL	E
61-3	Stier Anderson workpaper	ALL	ALL	E
61-4	Stier Anderson workpaper	ALL	ALL	E
63-2	Stier Anderson workpaper	ALL	ALL	E
65-1	Stier Anderson Final Report	ALL	ALL	E

LIBERTY CONSULTING WORKPAPERS:				
Document No.	Description	Page No(s).	Line No(s).	Justification
60-1/1	Liberty workpaper	1	ALL	G
60-3/2	Liberty workpapers	ALL	ALL	G
60-8/1	Liberty Record Request	1	1-2	G
61-2/1	Liberty workpaper	ALL	ALL	G
61-5	Liberty Record Request	1	ALL	G
61-6	Answers to Liberty Data Requests	ALL	ALL	G

INTERNAL MANAGEMENT POLICIES & PROCEDURES				
Document No.	Description	Page No(s).	Line No(s).	Justification
60-7/1	NUI Internal Control Procedures for OSS System sales and capacity release transactions	ALL	ALL	H
60-7/2	NUI Policy Statement - Brokering, Trading, & Risk Management Activities	ALL	ALL	H
60-7/3	NUI Trading Risk Management Policy	ALL	ALL	H

DELIOTTE & TOUCHE INTERNAL AUDIT				
Document No.	Description	Page No(s).	Line No(s).	Justification
60-7/4	Internal Audit	ALL	ALL	F

LEGEND

- A CUSTOMER-SPECIFIC INFORMATION - The redacted information includes customer names, customer locations, and/or customer addresses, telephone numbers, and/or rates the disclosure of which would harm the competitive business of NUI/City Gas and its affiliates, as well as the customers of NUI/City Gas and its affiliates. The Commission consistently has held that such customer-specific information constitutes proprietary, confidential business information, the disclosure of which would cause harm to the utility's competitive interests and, therefore, qualifies for confidential treatment under Section 366.093(3)(e), F.S. *See e.g.*, Order No. PSC-02-1248-CFO-GU issued October 25, 2002, in Docket No. 02-0003-GU; Order No. PSC-00-1569-CFO-EG issued August 31, 2000, in Docket No. 000002-EG.
- B BANKING INFORMATION – This redacted information includes bank account information which NUI/City Gas and its counter-parties routinely protect for each other. Confidentiality of such information is an important matter of commercial security because publication of bank account information could facilitate unauthorized access to those accounts and other abuses. The Commission previously has granted confidential treatment to such information. *See, e.g.*, Order No. 03-1421-CFO-EI issued December 16, 2003 in Docket No. 030001-EI.
- C NATURAL GAS SUPPLIER/CUSTOMER INFORMATION: These documents include invoices from gas suppliers, as well as Staff notes and record requests. The redacted information includes the names of gas suppliers from which City Gas and its affiliates purchases gas, names of customers to which City Gas or its affiliates sell gas, as well as volumes purchased and/or costs by gas supply source. Release of this information could provide competing gas suppliers with an advantage over City Gas and its affiliates, and suppliers may be less likely to make price concessions. Additionally Release of specific fuel cost data would enable a third party to compute City Gas' cost of gas by supplier. The release of any or all of this data may result in higher gas costs that would have to be passed along to City Gas' customers and would impair the company's efforts to contract for goods and services on favorable terms. Accordingly, this information is subject to confidential treatment under Section 366.093(3)(d), F.S. The Commission consistently has held that it is necessary to keep entire gas supplier invoices confidential because any person familiar with the format, fonts and/or type sizes of each gas supplier can easily determine that gas supplier's identity. *See e.g.*, Order No. PSC-02-0379-CFO-GU issued March 21, 2002, in Docket No. 020003-GU; Order No. 01-1186-CFO-GU issued May 25, 2001 in Docket No. 010003-GU.
- D CONTRACTUAL DATA - The redacted information includes contractual data, such as identity of gas supplier(s) or customer(s), rates, total costs, and other contractual terms, related to gas purchased or sold by City Gas. If disclosed, this information, either alone or in conjunction with non-confidential information on other workpapers, would give potential suppliers and/or customers sensitive information which would place the company at a competitive disadvantage in future contract negotiations. Additionally, as indicated in the

table, certain of the documents include confidentiality provisions prohibiting disclosure of the documents in whole or in part. Accordingly the redacted information constitutes confidential contractual data, "the disclosure of which would impair the efforts of the public utility or its affiliates to contract for goods or services on favorable terms." § 363.093(3)(d), F.S.

- E STIER ANDERSON INTERNAL AUDIT REPORT, WORKPAPERS, & STAFF NOTES REGARDING INTERNAL AUDIT-** These documents include a final report, workpapers, and Staff's notes related to an investigation undertaken by Stier Anderson LLC, a law firm engaged by the Audit Committee of the NUI Board of Directors as a result of allegations of inappropriate conduct by employee's of one of NUI's wholly owned subsidiaries, NUI Energy Brokers (NUIEB). The Audit Committee commissioned the investigation as part of a company's internal control structure. Thus, the Stier Anderson report, related workpapers, and notes of staff concerning the investigation relate to internal auditing controls and, therefore, fall within the definition of proprietary confidential business information under Section 366.093(b), F.S. The information redacted from the Stier Anderson report includes names of individuals who are under investigation by the State of New Jersey. NUI has signed a confidentiality agreement with the State of New Jersey prohibiting the release of this redacted information. The Stier Anderson workpapers and Staff notes regarding the investigation also include proprietary commercial and financial information the disclosure of which would impair the competitive business of the provider of the information under Section 366.093(3)(e), F.S, as well as information concerning bids or other contractual data, the disclosure of which would impair the efforts of the public utility or its affiliates to contract for goods and services on favorable terms under Section 366.093(3)(d), F.S. Accordingly, the redacted information qualifies for confidential treatment under Section 366.093, F.S.
- F DELIOITTE & TOUCHE INTERNAL AUDIT –** This document includes a report and associated work paper prepared as part of an internal audit performed by Deloitte & Touche regarding trading operations of NUI Energy Brokers (NUIEB) and the related risk management activities. The report and related workpapers relate to internal auditing controls and reports of internal audits and, therefore, fall within the definition of proprietary confidential business information under Section 366.093(3)(b), F.S. The redacted documents also include proprietary commercial and financial information the disclosure of which would impair the competitive business of the provider of the information under Section 366.093(3)(e), F.S. Accordingly, the redacted information qualifies for confidential treatment under Section 366.093, F.S
- G LIBERTY CONSULTING AUDIT WORKPAPERS AND STAFF WORKPAPERS REGARDNG SAME -** These documents include workpapers from Liberty Consulting Group (Liberty), which was commissioned by the New Jersey Board of Public Utilities to conduct a focused audit of City Gas affiliates (Elizabethtown Gas Company, NUI Utilities, Inc., and NUI Corporation (collectively "NUI")), as well as Staff workpapers related to the

Liberty audit. The documents include competitively sensitive information concerning transactions conducted by NUIEB. Such information was disclosed pursuant to a confidentiality agreement executed by NUI, Liberty, and the Attorney General of New Jersey, as attorney for the NJBPU. Disclosure of the information would impair the competitive business of the provider under Section 366.093(3)(d), F.S., as well as information concerning bids or other contractual data, the disclosure of which would impair the efforts of the public utility or its affiliates to contract for goods and services on favorable terms under Section 366.093(3)(d), F.S.. Accordingly, the information qualifies for confidential treatment under Section 366.093, F.S.

- H INTERNAL MANAGEMENT POLICIES AND PROCEDURES – These Documents contain confidential business policies and procedures utilized by NUI and its affiliates in conducting trading and risk management activities. Disclosure of this information would give competitors an advantage by providing access to NUI's decision-making process and related business practices. The documents therefore constitute information relating to the competitive business of the provider of the information under Section 366.093(3)(e), F.S.